

**IN THE UNITED STATES DISTRICT COURT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION

MDL No. 2:18-mn-2873-RMG

This Document Relates to:

*The Commonwealth of Puerto Rico v. 3M
Company, et al.*, Case No.: 2:23-cv-02351-
RMG

**DECLARATION OF JIMMY ROCK IN SUPPORT OF COMMONWEALTH OF
PUERTO RICO’S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

Pursuant to 28 U.S.C. § 1746, I, Jimmy Rock, declare as follows:

1. I am a Partner with the firm Edelson PC, attorney for Plaintiff, the Commonwealth of Puerto Rico (“Commonwealth”). I am fully familiar with the facts and circumstances set forth herein and know them to be true, except for those stated to be upon information and belief, and as to those matters, I believe them to be true.

2. I submit this declaration in support of the Commonwealth’s motion for leave to file an amended complaint (the “Motion”).

3. The amended complaint seeks to add as plaintiffs the following instrumentalities of the Commonwealth: the Puerto Rico Port Authority, the Puerto Rico Aqueduct and Sewer Authority, and the Puerto Rico Electric and Power Authority.

4. Pursuant to paragraph 3 of this Court’s Case Management Order No. 2A, I affirm that prior to filing this motion, the undersigned conferred with Co-Lead Counsel for Plaintiffs about this motion and Co-Lead counsel consented to the filing of the motion.

5. Pursuant to Local Rule 7.02, I affirm that prior to filing this motion, counsel for the Commonwealth informed Defendants' Co-Lead Counsel of the Commonwealth's intent to file the instant motion, and Co-Lead Counsel consented to the motion.

6. Attached hereto as **Exhibit A**, is a true and correct copy of the Proposed Amended Complaint.

7. Attached hereto as **Exhibit B**, is a true and correct copy of the Redline of Proposed Amended Complaint marked against the Original Complaint.

Dated: July 31, 2023

By /s/ Jimmy R. Rock
Jimmy Rock